

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	Chapter 11
GDC TECHNICS, LLC,	§	
	§	Case No. 21-50484
Debtor.	§	

**AGREED MOTION FOR ENTRY OF STIPULATION AND AGREED ORDER AMONG
(A) THE DEBTOR, (B) RELATOR AHMED BASHIR, AND
(C) EMERALD AEROSPACE, LLC, EXTENDING RESPONSE DEADLINE**

1. GDC Technics, LLC (the “Debtor”), United States of America ex. Rel Ahmed Bashir (“Relator”), and Emerald Aerospace, LLC (“Aerospace”) respectfully request that the Court enter the *Stipulation and Agreed Order among (A) the Debtor, (B) Relator Ahmed Bashir, and (C) Emerald Aerospace, LLC, Extending Response Deadline* (the “Deadline Extension Order”) attached hereto as **Exhibit A**.

2. On August 25, 2021, Debtor filed *Objection to Claim No. 122 of the United States of America Ex. Rel Ahmed Bashir with Notice thereof, (30 Day Objection Language)* (Docket No. 366) and *Objection to Claim No. 129 of Emerald Aerospace, LLC with Notice thereof, (30 Day Objection Language)* (Docket No. 367) (together, the “Claims Objections”). The Claims Objections include language setting a thirty (30) day response deadline. The deadline for responses is currently September 24, 2021. The proposed Agreed Order extends the deadline for responses to the Claims Objections by fourteen (14) days.

3. The Debtor, Relator, and Emerald have each agreed to the terms of the Deadline Extension Order.

WHEREFORE, the Debtor respectfully requests that the Court enter the Deadline Extension Order attached hereto as **Exhibit A** and grant such other relief as the Court deems just.

Respectfully submitted this 21st day of September, 2021.

/s/ Scott Lawrence

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*Counsel to the Debtor
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*Counsel to Relator Bashir and Emerald
Aerospace, LLC*

CERTIFICATE OF SERVICE

I certify that on September 21, 2021, a true and correct copy of the foregoing document was served on the parties on the attached service list, via email to the email addresses for the parties noted on the attached service list.

/s/ Thomas Berghman

Thomas D. Berghman, Esq.

EXHIBIT A

Deadline Extension Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	Chapter 11
GDC TECHNICS, LLC,	§	
	§	Case No. 21-50484
Debtor.	§	

**STIPULATION AND AGREED ORDER AMONG
(A) THE DEBTOR, (B) RELATOR AHMED BASHIR, AND
(C) EMERALD AEROSPACE, LLC, EXTENDING RESPONSE DEADLINE**

This Stipulation and Agreed Order is entered into by and among: (a) GDC Technics, LLC (the “Debtor”); (b) United States of America ex. Rel Ahmed Bashir (“Relator”); and (c) Emerald Aerospace, LLC (“Emerald” and, collectively with the Debtor and Relator, the “Parties”). The Parties, by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on August 18, 2021, Relator and Emerald filed proofs of claims 122 and 129 in this Bankruptcy Case.

WHEREAS, on August 25, 2021, Debtor filed *Objection to Claim No. 122 of the United States of America Ex. Rel Ahmed Bashir with Notice thereof, (30 Day Objection Language)* (Docket No. 366) (the “Relator Claim Objection”).

WHEREAS, on August 25, 2021, Debtor filed *Objection to Claim No. 129 of Emerald Aerospace, LLC with Notice thereof, (30 Day Objection Language)* (Docket No. 367) (the “Emerald Claim Objection” and, together with the Relator Claim Objection, the “Claims Objections”).

WHEREAS, the current deadline to respond to the Claims Objections is September 24, 2021.

WHEREAS, the Parties are currently engaged in negotiations and wish to extend the response deadline as to the Claims Objections.

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

1. The deadline to respond to the Claims Objections shall be extended by 14 days.
2. Any response to the Claims Objections shall be filed no later than October 8, 2021.
3. Each Party represents that it possesses full power and authority to execute, deliver, and perform their respective obligations under this Stipulation and Agreed Order, and that each person executing this Stipulation and Agreed Order on its behalf is duly authorized to execute and deliver this Stipulation and Agreed Order.
4. This Stipulation and Agreed Order may be executed in identical counterparts, including by email, each of which shall be deemed an original, but all of which together constitute one and the same instrument.

IT IS SO ORDERED

END OF ORDER

IN WITNESS WHEREOF, the Debtor, Relator Ahmed Bashir, and Emerald, by their respective authorized counsel, executed this Stipulation and Agreed Order as of the date written below.

Dated: September 21, 2021.

/s/ Scott Lawrence

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